



July 19, 2016

Department of Water Resources  
1416 9<sup>th</sup> Street  
Sacramento, CA 95814  
[DWR\\_IRWM@water.ca.gov](mailto:DWR_IRWM@water.ca.gov)

**Re: 2016 Water-Energy Grant Program Guidelines and PSP**

To whom it may concern,

TreePeople commends the Department of Water Resources (DWR) for the latest revisions to the draft 2016 Water-Energy Grant Program (WEGP) Guidelines, and specifically the program's expansion to include residential projects that benefit disadvantaged communities. However, limiting the WEGP to projects in which the energy use reduction is directly linked to onsite water savings represents a significant missed opportunity. Given the fundamental connection between the water and energy systems—where onsite water savings have a direct link to offsite energy savings—WEGP funding eligibility should be expanded to projects that conserve municipal water or offset municipal water use, and that, in turn, achieve indirect energy savings and greenhouse gas (GHG) emission reductions.<sup>1</sup> Newly eligible project measures could include turf removal and rainwater harvesting incentive programs, which have an added ancillary public education benefit, triggering fundamental behavior change and further water conservation critical to the region's long-term sustainability.

As has been well documented, tremendous amounts of energy are required to power California's water system, pumping, treating and conveying water throughout the state. The water system accounts for almost 20 percent of total electricity and 30 percent of non-power related natural gas consumption in California, according to the most recent data from the California Energy Commission, equaling the carbon footprint of five 600-megawatt coal plants. In light of the clear and considerable nexus between the water and energy systems, it is only appropriate for the WEGP to include projects that produce onsite water savings with resultant offsite energy savings, opening the door to sizeable and critical GHG reduction possibilities currently excluded from consideration.

Failing to revise the 2016 WEGP Guidelines as detailed above, DWR and ARB should support ongoing efforts to establish a GHG emissions inventory and associated program to extend GHG Reduction Fund eligibility to appropriate water conservation projects, including local water conservation and supply augmentation measures.

TreePeople is a Los Angeles-based non-profit organization that has been dedicated to achieving sustainable solutions to environmental challenges for more than 40 years. We

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<sup>1</sup> Were the WEGP expanded to include projects with onsite water and resultant offsite energy savings, it would be necessary to revise the California Air Resources Board's (ARB) related quantification methodology and GHG emission calculator accordingly.

believe that 21<sup>st</sup> century green infrastructure—using natural systems to revive ecosystem services—is vital to realize a sustainable, climate-resilient region. TreePeople works with communities, public agencies and diverse partners to promote and implement green infrastructure on private parcels, school campuses, public parks, streets and sidewalks. Water conservation, reclamation and supply augmentation measures are a primary focus of our efforts.

We thank you for your consideration and continued support of a sustainable California.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Weinstein Bloome". The ink is dark and the signature is fluid, with the first and last names being more prominent than the middle name.

Deborah Weinstein Bloome  
Senior Director of Policy  
TreePeople